

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust
Litigation, MDL 2817*

No. 1:18-CV-864

This document relates to:

Hon. Robert M. Dow, Jr.

*Authenticom, Inc. v. CDK Global, LLC et al.,
Case No. 1:18-cv-00868 (N.D. Ill.)*

Magistrate Judge Jeffrey T. Gilbert

**DEFENDANTS' MOTION TO COMPEL OUTSTANDING DISCOVERY AND
TESTIMONY FROM PLAINTIFF AUTHENTICOM, INC.**

Defendants The Reynolds & Reynolds Company and CDK Global, LLC respectfully move this Court to compel outstanding discovery and testimony from Plaintiff Authenticom, Inc. Specifically, Defendants request that the Court compel (1) Authenticom to produce any polling client manager logs it has retained and, at the very least, a seven-day example of such a log and (2) the continuation of the Authenticom 30(b)(6) deposition so that Defendants can cover topics that the witness had previously refused to answer questions on. In support of this motion, Defendants incorporate by reference the brief in support of and exhibits filed concurrently herewith and any oral argument that the Court may allow at a hearing on this Motion.

Pursuant to Local Rule 37.2, Defendants certify that they have met and conferred with counsel for Plaintiff Authenticom in a good faith attempt to resolve the disputes presented by this Motion. These meetings included, but were not limited to, teleconferences held on December 21, 2018, January 18, 2019, March 12, 2019, March 20, 2019, and May 3, 2019.

Dated: June 5, 2019

Respectfully submitted,

/s/ Britt M. Miller

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CERTIFICATE OF SERVICE

I, Aundrea Gulley, an attorney, hereby certify that on June 5, 2019, I caused a true and correct copy of the foregoing **DEFENDANTS' MOTION TO COMPEL OUTSTANDING DISCOVERY AND TESTIMONY FROM PLAINTIFF AUTHENTICOM, INC.**, to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by email to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

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